

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA (Harrisburg)

IN RE: : Chapter 13
: :
DAVID ROBERT THOMPSON AND., :
DENISE PEARL THOMPSON, :
Debtors : Case No.: 1:18-bk-00449-RNO

**ENTRY OF APPEARANCE AND REQUEST FOR SERVICE
OF DOCUMENTS, RECEIPT OF NOTICES, AND INCLUSION
ON SERVICE AND NOTICE LISTS AND MAILING MATRICES**

To the Clerk of the Bankruptcy Court, the Debtor(s), All Trustees, All Creditors, and All Other Parties in Interest:

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Bankruptcy Procedure 2002 and 9010, the undersigned hereby appears in the captioned bankruptcy case on behalf of Deere & Company (“Deere”) and requests that any service or notice made or given or required to be made or given in the case, including, but not limited to, service or notice of any order, application, motion, petition, complaint, objection, answer, response, pleading, claim, correspondence or other document or communication of any kind, whether written or oral, and whether transmitted or conveyed in person or by telephone, mail, courier service, hand delivery, telefax, telegraph, telex, e-mail, ECF noticing or otherwise, which affects the Debtor(s) and/or Deere, be made upon or given to:

Clayton W. Davidson, Esquire
PA Attorney I.D. 79139
100 Pine Street - P.O. Box 1166
Harrisburg, PA 17108-1166
Direct Fax: 717-260-1678
Phone: 717-232-8000
cdavidson@mcneeslaw.com

PLEASE TAKE FURTHER NOTICE that this entry of appearance is not intended as, nor is it to be construed or interpreted as, a consent to jurisdiction of the Bankruptcy Court over Deere, specifically, but not limited to, jurisdiction over: (i) Deere’s right to have any final order in any non-core matter entered only after *de novo* review by a District Judge, (ii) Deere’s right to a trial by jury in any proceeding triable herein or in any case, controversy or proceeding related

hereto, (iii) Deere's right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal, and (iv) any other claim, action, defense, setoff, recoupment, counterclaim, right or remedy to which Deere is or may be entitled under any agreement, or at law or in equity, all of which are hereby expressly reserved by Deere.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

Date: July 25, 2018

By: /s/*Clayton W. Davidson*

Clayton W. Davidson
Attorney I.D. 79139
100 Pine Street - P.O. Box 1166
Harrisburg, PA 17108-1166
Direct Fax: 717-260-1678
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Attorneys for Deere & Company

CERTIFICATE OF SERVICE

I, Tiffany Riser an authorized representative, of the firm of McNees Wallace & Nurick LLC, hereby certify that on this day served a true and correct copy of the Entry Of Appearance And Request For Service Of Papers, Receipts Of Notices And Inclusion Of Notice Lists And Mailing Matrices on behalf of John Deere Financial., upon the parties listed below by filing it with the Clerk of the Bankruptcy Court using the CM/ECF system, or by United States Mail, postage prepaid, addressed as follows:

Gary J Imblum

Imblum Law Offices, P.C.
4615 Derry Street
Harrisburg, PA 17111
Email: gary.imblum@imblumlaw.com
(sent via CM/ECF)

United States Trustee

228 Walnut Street, Suite 1190
Harrisburg, PA 17101
(sent via CM/ECF)

Counsel for Debtors

VIA FIRST CLASS MAIL

Charles J DeHart, III (Trustee)
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Trustee

McNEES WALLACE & NURICK LLC

Date: July 25, 2018

By: /s/ Tiffany L. Riser
Tiffany L. Riser